

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

Plaintiff,

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,  
GREGORY ELEFTERAKIS, ROMAN POLLAK,  
ANTHONY BRIDDA, IME COMPANIONS LLC,  
CLIENT EXAM SERVICES LLC, and IME  
MANAGEMENT & CONSULTING LLC,

Defendants.

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Upon the annexed Complaint, the declarations of Emanuel Kataev, Esq., Daniella Levi, Esq., and the annexed Memorandum of Law in support,

**LET** the defendants, Safa Abdulrahim Gelardi (“Safa”), Vito Gelardi (“Vito”), and IME Companions LLC (“Companions”) (Safa, Vito, and Companions collectively the “Defendants”) and non-parties Eugene Liddie (“Liddie”) and IME Legal Reps (“IMELR”), show cause before the Hon. Pamela K. Chen, U.S.D.J., of this Court to be held at the courthouse thereof, located at 225 Cadman Plaza East, Courtroom 4F North, Brooklyn , NY 11201, on the \_\_\_\_\_ day of \_\_\_\_\_, 2024 at \_\_\_\_\_ o’clock in the \_\_\_\_noon of that day, or as soon thereafter as counsel can be heard, why an Order should not be issued:

(a) preliminarily enjoining Defendants, Liddie, IMELR, and any persons or entities acting in concert with or on behalf of Defendants, Liddie, and IMELR from serving customers on the Enjoined Customers List;

(b) preliminarily enjoining Defendants, Liddie, IMELR, and any persons or entities acting in concert with or on behalf of Defendants, Liddie, and IMELR from using in any manner whatsoever IME WatchDog, Inc.’s (“IME WatchDog”) trade secret and confidential and

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**ORDER TO SHOW CAUSE**

proprietary information (including, without limitation, IME WatchDog's customer database, including the identity and contact information of IME WatchDog's customers, or any other information regarding IME WatchDog's customers, clients, transactions, financial information, or other matters involving IME WatchDog);

(c) directing Defendants, Liddie, and IMELR to return to IME WatchDog all originals and copies of documents, records, and information, whether in hard copy and/or computerized and/or other electronic media form, that contain IME WatchDog's trade secrets and confidential and proprietary information (including, without limitation, IME WatchDog's customer database, including the identity and contact information of IME WatchDog's customers, and for each customer of IME WatchDog the services offered and payments received from IME WatchDog's customers, and/or other matters involving IME WatchDog and which Defendants obtained or accessed, including without limitation information regarding IME WatchDog's customers, clients, transactions, financial information, or other information involving IME WatchDog) with the use of an independent third-party monitor to be paid for by Defendants, Liddie, and IMELR;

(d) directing Defendants, Liddie, and IMELR to make all electronic accounts that are in their custody or control and on which they stored information regarding IME WatchDog's trade secrets and confidential or proprietary information available and accessible to IME WatchDog (including providing relevant passwords) to inspect to ensure IME WatchDog's trade secrets and confidential and proprietary information is secure and has not been improperly copied or distributed and to determine all violations of this Court's Orders;

(e) directing Defendants, Liddie, and IMELR to pay for a forensic analysis of their digital devices;

- (f) issuing a Court-Authorized Notice to customers on the Enjoined Customers List;
- (g) preliminarily enjoining Defendants, Liddie, and IMELR from contacting any IME WatchDog clients and/or individuals currently performing services for IME Watchdog;
- (h) directing Defendants, Liddie, and IMELR to place a public notice on the home page of the websites [www.imelegalreps.com](http://www.imelegalreps.com), [www.theimecompany.com](http://www.theimecompany.com), and any other website operated by Defendants, Liddle, and IMELR with the Court-Authorized Notice; and
- (i) preliminarily enjoining Defendants, Liddie, and IMELR from operating Companions and/or IME Legal Reps due to their prior and continued contempt of this Court's Orders; and
- (j) directing the U.S. Marshal to arrest Safa, Vito, and/or Liddie due to their demonstrable perjury and willful and contumacious conduct in disobeying this Court's multiple Orders, and it is further

**ORDERED**, that pending the hearing and determination of this application, and further order of this Court, Defendants, Liddie, IMELR, and any persons/entities acting in concert with them, are hereby:

- (a) preliminarily enjoined from serving customers on the Enjoined Customers List;
- (b) preliminarily enjoined from using in any manner whatsoever IME WatchDog's trade secret and confidential and proprietary information (including, without limitation, IME WatchDog's customer database, including the identity and contact information of IME WatchDog's customers, or any other information regarding IME WatchDog's customers, clients, transactions, financial information, or other matters involving IME WatchDog);
- (c) directed to return to IME WatchDog all originals and copies of documents, records, and information, whether in hard copy and/or computerized and/or other electronic

media form, that contain IME WatchDog's trade secrets and confidential and proprietary information (including, without limitation, IME WatchDog's customer database, including the identity and contact information of IME WatchDog's customers, and for each customer of IME WatchDog, the services offered and payments received from IME WatchDog's customers, and/or other matters involving IME WatchDog and which Defendants obtained or accessed, including without limitation information regarding IME WatchDog's customers, clients, transactions, financial information, or other information involving IME WatchDog and to cooperate with an independent third-party court monitor to do so;

(d) directed to make all electronic accounts that are in their custody or control and on which they stored information regarding IME WatchDog, Inc.'s trade secrets and confidential or proprietary information available and accessible to IME WatchDog, Inc. (including providing relevant passwords) to inspect to ensure IME WatchDog, Inc.'s trade secrets and confidential and proprietary information is secure and has not been improperly copied or distributed and to determine all violations of this Court's Orders;

(e) directed to pay for a forensic analysis of their digital devices;

(f) directed to provide a list of all customers served by Defendants, Liddle, and/or IMELR for purposes of issuing a Court-Authorized Notice;

(g) preliminarily enjoined from contacting IME WatchDog's clients and/or agents;

(h) directed to place a public notice on the home page of the websites [www.imelegalreps.com](http://www.imelegalreps.com), [www.theimecompany.com](http://www.theimecompany.com), and any other website operated by Defendants, Liddle, and IMELR with a Court-Authorized Notice to be approved by the Court;

(i) preliminarily enjoined from continuing to operate their business due to their prior and continued contempt of this Court's Orders; and

(j) Safa, Vito, and Liddie are directed to surrender themselves to the custody of the U.S. Marshal due to their demonstrable perjury and willful and contumacious conduct in disobeying this Court's multiple Orders; and it is further

**ORDERED** that pending the hearing of this matter, IME WatchDog shall be permitted to conduct discovery on an expedited basis as against Liddie and IMELR, including obtaining documents from Liddie and IMELR and taking depositions in aid of the requested injunctive relief, and it is further

**ORDERED** that service by email and federal express of a copy of this Order, along with the papers upon which it is based, shall be made upon Defendants via ECF and upon Liddie and IMELR at 329 Brookville Avenue, Islip, NY 11751, and via email to his counsel at [kcharrington@charringtonlawfirm.com](mailto:kcharrington@charringtonlawfirm.com) on or before the \_\_\_\_ day of June, 2024, and such service shall be deemed good and sufficient; and it is further

**ORDERED** that answering papers, if any, shall be served on IME WatchDog, Inc.'s counsel, Emanuel Kataev, Esq., Sage Legal LLC, 18211 Jamaica Avenue, Jamaica, NY 11042-1073, via electronic mail at [emanuel@sagelegal.nyc](mailto:emanuel@sagelegal.nyc) on or before the \_\_\_\_\_ day of \_\_\_\_\_, 2024.

Dated:

**SO ORDERED:**

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, U.S.D.J.